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PCM USAO# 2023R00218

USDC - BALTIMORE  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DARIUS GILCHRIST

Defendant.

CRIMINAL NO. GLR-23-117

(Possession of a Firearm and  
Ammunition by a Prohibited Person,  
18 U.S.C. § 922(g)(1) Forfeiture, 18  
U.S.C. § 924(d), 21 U.S.C. § 853, 28  
U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about February 8, 2023, in the District of Maryland, the Defendant,

**DARIUS GILCHRIST,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Smith & Wesson, Model SD9VE, 9mm semi-automatic pistol, with serial number HEB3099; 16 rounds of 9mm ammunition; 11 rounds of .357 caliber ammunition; and 1 round of .32 caliber ammunition; and the firearms and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under the offense charged in Count One of this Indictment.

**Firearms and Ammunition Forfeiture**

2. Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of an offense alleged in Count One, the Defendant shall forfeit to the United States any firearms and ammunition involved in the offense.

**Property Subject to Forfeiture**

3. The property to be forfeited includes, but is not limited to:
- a. a S&W, Model SD9VE, 9mm semi-automatic pistol, with serial number HEB3099;
  - b. approximately 16 rounds of 9mm caliber ammunition;
  - c. approximately 11 rounds of .357 caliber ammunition; and
  - d. approximately one round of .32 caliber ammunition.


**Substitute Assets**

4. Pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

18 U.S.C. § 924(d)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Erik L. Barron  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson

  
Date